

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND  
COMMERCIAL WORKERS UNION'S AND  
EMPLOYERS' HEALTH AND WELFARE TRUST  
FUND, on behalf of itself and all others similarly  
situated,

Plaintiff,

v.

PURDUE PHARMA L.P., PURDUE PHARMA,  
INC., THE PURDUE FREDERICK COMPANY,  
INC. d/b/a THE PURDUE FREDERICK  
COMPANY, P.F. LABORATORIES, INC.,  
ABBOTT LABORATORIES, ABBOTT  
LABORATORIES, INC., MICHAEL FRIEDMAN,  
HOWARD R. UDELL, PAUL D. GOLDENHEIM,  
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.  
1 through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

MOTION TO ADMIT COUNSEL  
*PRO HAC VICE*

FILED  
2007 NOV -1 PM 10:50  
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern and Eastern Districts of New York, I, Christopher A. Seeger, a member in good  
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*  
of:

TerriAnne Benedetto  
Seeger Weiss LLP  
1515 Market Street, Suite 1380  
Philadelphia, PA 19102  
Telephone: (215) 564-2300  
Fax: (215) 851-8029

TerriAnne Benedetto is a member in good standing of the Bars of the Commonwealth of  
Pennsylvania and the State of New Jersey. There are no pending disciplinary proceedings  
against her in any State or Federal Court. Attached hereto as Exhibit 1 is Ms. Benedetto's  
Affidavit, with Exhibit A, an original Certificate of Good Standing from the Pennsylvania

11-1-11  
Set  
6316228

Supreme Court, and Exhibit B, an original Certificate of Good Standing from the New Jersey Supreme Court, attached thereto.

Dated: October 31, 2007

Respectfully Submitted,

SEEGER WEISS LLP

By: 

\_\_\_\_\_  
Christopher A. Seeger (CS-4880)  
One William Street  
New York, NY 10004  
Telephone: (212) 584-0700  
Facsimile: (212) 584-0799

*Counsel for Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
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**AFFIDAVIT OF CHRISTOPHER  
A. SEEGER IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
*PRO HAC VICE***

State of New York                    )  
  )ss:  
County of New York                )

Christopher A. Seeger, being duly sworn, hereby deposes and says as follows:

1. I am a member of Seeger Weiss LLP, counsel for Movant, New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund ("Movant"), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Movant's motion to admit TerriAnne Benedetto as counsel *pro hac vice* to represent Movant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known TerriAnne Benedetto since 2006.

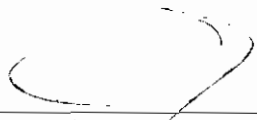
4. Ms. Benedetto is an associate with my firm.

5. I have found Ms. Benedetto to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of TerriAnne Benedetto, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of TerriAnne Benedetto, *pro hac vice*, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit TerriAnne Benedetto, *pro hac vice*, to represent Movants in the above-captioned matter, be granted.

  
\_\_\_\_\_  
Christopher A. Seeger

Sworn before me this 31<sup>st</sup> day  
of OCTOBER, 2007

  
\_\_\_\_\_  
NOTARY PUBLIC

**Jose D. Mora**  
Notary Public State of New York  
No. 03-0062383 Qualified in Bronx County  
Certificate Filed in New York County  
Commission Expires August 6, 2009

**CERTIFICATE OF SERVICE**

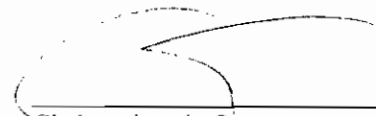
I, Christopher A. Secger hereby certify that on October 31, 2007, I caused a true and correct copy of the foregoing document, ***Motion to Admit Counsel Pro Hac Vice***, to be served via U.S. mail, with proper postage prepaid, on all counsel of record at the following addresses:

Michael Colbert Hartmere, Esq.  
Matthew Terrence McLaughlin, Esq.  
**VENABLE (NYC)**  
405 Lexington Ave, 62nd Floor  
New York, NY 10174  
T. (212)-307-5500  
F. (212)-307-5598 (fax)

*Counsel for defendants **Abbott Laboratories, Abbott Laboratories, Inc.***

Alexandra Katherine Nello, Esq.  
Donald I. Strauber, Esq.  
Phoebe Anne Wilkinson, Esq.  
Mary Therese Yelenick, Esq.  
**CHADBOURNE & PARKE LLP (NY)**  
30 Rockefeller Plaza  
New York, NY 10112  
T. (212) 408-5100  
F. (646) 710-1189

*Counsel for defendants **P.F. Laboratories, Inc., Purdue Pharma, Inc., Purdue Pharma, L.P., The Purdue Frederick Company, Inc., Howard R. Udell, Michael Friedman, Paul D. Goldenheim***

  
\_\_\_\_\_  
Christopher A. Secger

**UNITED STATES DISTRICT COURT  
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Defendants.

**Civil Action No. 07-cv-6916-JGK**

**AFFIDAVIT OF TERRIANNE  
BENEDETTO, ESQUIRE**

I, TerriAnne Benedetto, Esquire, an associate of Seeger Weiss LLP, in the Philadelphia, Pennsylvania office, declare the following under penalty of perjury:

1. I am a member in good standing of the bars of the Commonwealth of Pennsylvania and State of New Jersey and am admitted to practice before the United States District Courts for the Eastern District of Pennsylvania, the District of New Jersey and the Western District of Wisconsin. I have never been disciplined, suspended or disbarred by these or any other Court.

2. Attached hereto are Certificates attesting to my admission dates and that I am a member in good standing in both the bars of the Commonwealth of Pennsylvania and the State of New Jersey.


3. I have extensive experience in state and federal trial courts. I also have experience in pharmaceutical litigation, including *In re Lupron Marketing and Sales Practices Litig.*, MDL No. 1430 (D. Mass.) and *In re Pharmaceutical Industry Average Wholesale Price Litig.*, MDL No. 1456 (D. Mass), where I represented consumers and third party payors against numerous pharmaceutical companies and was admitted *pro hac vice* in the District Court of Massachusetts in connection therewith. Accordingly, New Mexico UFCW Union's and Employers' Health and Welfare Trust Fund has asked that I serve as co-counsel.

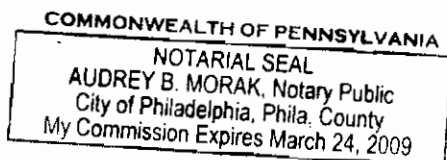
4. Based upon the foregoing, I respectfully request admission to this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for Southern District and Eastern District of New York, for the purpose of appearing and arguing on behalf of plaintiff, which is represented by the firm, Sceger Weiss LLP.



TerriAnne Benedetto

Sworn before me this 30<sup>th</sup> day  
of October, 2007

  
Notary Public





Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***Terri Anne Benedetto, Esq.***

**DATE OF ADMISSION**

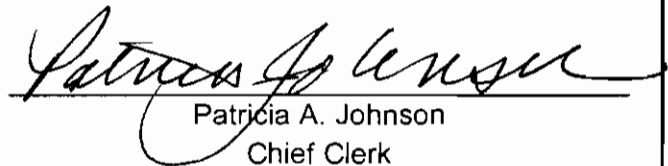
***December 13, 1990***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: October 11, 2007**

  
Patricia A. Johnson  
Chief Clerk



# Supreme Court of New Jersey

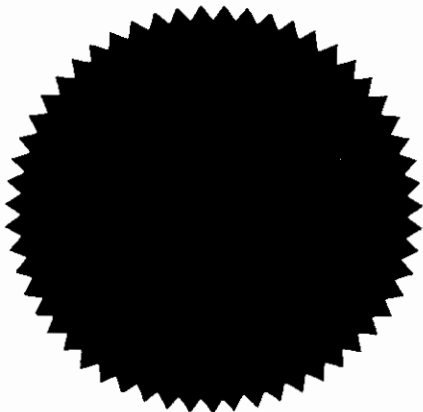


## Certificate of Good Standing

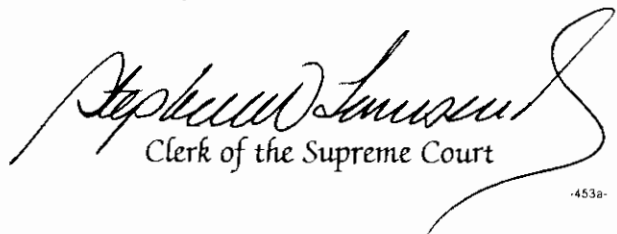
This is to certify that **TERRIANNE BENEDETTO**  
(No. **040891990** ) was constituted and appointed an Attorney at Law of New  
Jersey on **January 09, 1991** and, as such,  
has been admitted to practice before the Supreme Court and all other courts of this State  
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in  
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"  
if the Court's records reflect that the attorney: 1) is current with all assessments  
imposed as a part of the filing of the annual Attorney Registration Statement, including,  
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client  
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not  
resigned from the Bar of this State; and 4) has not been transferred to Disability  
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's  
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to  
practice law in this State.*



In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
12TH day of October , 20 07

  
Clerk of the Supreme Court

**UNITED STATES DISTRICT COURT  
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Defendants.

**Civil Action No. 07-cv-6916-JGK**

**ORDER FOR ADMISSION  
PRO HAC VICE ON  
WRITTEN MOTION**

Upon the motion of Christopher A. Seeger, attorney for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

TerriAnne Benedetto  
Seeger Weiss LLP  
1515 Market Street, Suite 1380  
Philadelphia, PA 19102  
T. (215) 564-2300  
F. (215) 851-8029  
Email: [tbenedetto@seegerweiss.com](mailto:tbenedetto@seegerweiss.com)

is admitted to practice *pro hac vice* as counsel for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund in the above-captioned case in

the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: October \_\_, 2007  
New York, New York

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United States District Court Judge